

/s/ Vernelis K. Armstrong
U. S. Magistrate Judge

Dated: 08/06/09

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

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|-------------------|---|---|
| FRANKLIN E. LONG, |) | |
| |) | CASE NO. 3:09 CV 00915 |
| Plaintiff, |) | |
| |) | JUDGE JACK ZOUHARY |
| v. |) | |
| |) | MOTION FOR EXTENSION OF TIME TO |
| MIDLAND CREDIT |) | MOVE, PLEAD, OR OTHERWISE |
| MANAGEMENT, INC. |) | RESPOND TO PLAINTIFF'S COMPLAINT |
| |) | |
| Defendant. |) | |

Defendant Midland Credit Management, Inc. ("Midland") respectfully requests an additional thirty days up to and including September 4, 2009, to file its response to the Complaint of Plaintiff Franklin E. Long.

Defendant has neither requested nor received any prior such extension, and is not requesting this extension for any inappropriate purpose. Undersigned counsel has just been retained, however, and has not had the opportunity to collect documents and investigate the matter so that a proper response can be prepared.